

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court
Southern District of Texas
FILED

SEP 17 2018

David J. Bradley, Clerk

United States of America)

v.)

Victor ^{Ignacio} LOPEZ-Rodriguez)

YOB: 1984)

Mexican National)

Case No. **M-18-1935-M**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 15, 2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC 841

21 USC 846

Offense Description

Defendant did, knowingly and intentionally possess with the intent to distribute approximately 5.28 kilograms of cocaine, a Schedule II controlled substance, and did knowingly and intentionally conspire to possess with intent to distribute with persons known and unknown approximately 5.28 kilograms of cocaine, a Schedule II controlled substance

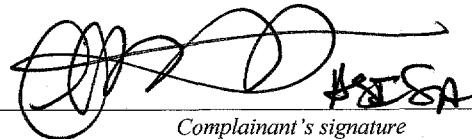
This criminal complaint is based on these facts:

Before the United States Magistrate Judge, Southern District of Texas, I, Christina Bergeron Flores, Special Agent, United States Immigration and Customs Enforcement, being duly sworn, depose and say the following:

See Attachment A

☒ Continued on the attached sheet.Approved S. David A. Lindemann9/17/18

Sworn to before me and signed in my presence.

Date: 09/17/2018 9:03 amCity and state: McAllen, Texas

Complainant's signature

Christina Bergeron Flores, HSI Special Agent

Printed name and title



Judge's signature

Peter E. Ormsby, U.S. Magistrate Judge

Printed name and title

Attachment A

On or about September 15, 2018, U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) McAllen, Texas conducted the arrest of Victor LOPEZ- Rodriguez (hereafter LOPEZ) for possession with intent to distribute approximately 5.28 kilograms of cocaine concealed within the vehicle he was driving when applying for entry into the U.S at the Los Ebanos, Texas Port of Entry (POE).

HSI McAllen, Texas received a request for investigative assistance from the U.S. Customs and Border Protection Office of Field Operations (CBP OFO) at the Los Ebanos POE. Customs and Border Protection Officers (CBPOs) detained Victor LOPEZ- Rodriguez (hereafter LOPEZ) after discovering five packages containing a white powdery substance which field-tested positive for cocaine, weighing a total of 5.28 kilograms (kg), concealed under the backseat of the vehicle LOPEZ was driving when applying for entry into the U.S.

At primary inspection, CBPO stated he observed that the backseat of the vehicle to be loosely seated according to his training and experience. CBPO lifted the backseat of the vehicle and discovered five (packages) of a white powdery substance. During secondary inspection of the subject, LOPEZ stated to CBPO that he knew that there were five (5) kilograms of cocaine concealed within the vehicle. CBPOs conducted field tests of the packages yielding positive results for properties of cocaine.

During interview, HSI Special Agent and HSI Task Force Officer questioned LOPEZ concerning the purpose and details of his frequent travels into the U.S. from Mexico. LOPEZ stated he was hired to transport illegal narcotics into the U.S. to unidentified individual in the Rio Grande Valley area. LOPEZ stated he was being paid \$2,500 to transport illegal narcotics to an unknown location in the Rio Grande Valley which was concealed within the backseat of the vehicle he was driving. LOPEZ stated he assisted in loading the packages of cocaine into the vehicle he was driving.